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September 22, 2016

Mary S. Hamilton
Environmental Scientist
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

**RE: 2014 Integrated Report**

Dear Ms. Hamilton,

Please accept the following comments on the Central Coast Regional Water Quality Control Board's (Regional Board's) 2014 Integrated Report, which are hereby submitted by Santa Barbara Channelkeeper.

Santa Barbara Channelkeeper is a non-profit environmental organization dedicated to protecting and restoring the Santa Barbara Channel and its watersheds through science-based advocacy, education, field work and enforcement. We have been conducting water quality monitoring in watersheds from Gaviota to the Ventura River since 2001. We have engaged more than 1,200 volunteers in our monitoring efforts and represent over 750 members.

Our comments will address the following concerns:

- Procedural concerns
- Inappropriate de-listings
- Separate determinations for lagoons and upstream reach segments
- Additional recommended listings justified by historic and current datasets

Generally, Channelkeeper supports the Regional Board's ongoing efforts to document water quality impairments on the 303(d) List that are based on credible water quality monitoring data and appropriate evaluation criteria. Specific concerns regarding the Draft 2014 Integrated Report are summarized below.

## 1. Procedural Concerns

### A. Data Solicitation Gaps

Channelkeeper is troubled that the Regional Board has fallen so far behind on data solicitations and review of 303(d) listings. 40 C.F.R. § 130.7(d)(1) mandates that:

> "Each State shall submit ***biennially*** to the Regional Administrator beginning in 1992 the list of waters, pollutants causing impairment, and the priority ranking including waters targeted for TMDL development within the next two years as required under paragraph (b) of this section."

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The 2014 Integrated Report is based on data submitted in 2010 and will not be finalized until the end of 2016. Based on EPA Guidance, the 2016 Integrated Report was due in April 2016.[1] Clearly, the Regional Board has failed to achieve pertinent milestones and mandates related to the biennial review process.

The lack of any recent data solicitation is particularly troubling as a fully accurate and current depiction of water quality is not available for the 2014 Integrated Report. The Regional Board has a mandate to "assemble and evaluate all existing and readily available water quality-related data and information to develop the list."[2] Accordingly, the Regional Board should base 2014 Integrated Report decisions based on "all existing and readily available" data, which includes data collected since the 2010 data solicitation. Six years of additional data is available to the Board and should be appropriately utilized for the Region's listing, de-listing and planning purposes. Channelkeeper questions how such determinations can reasonably or legally be made without consideration of the last six years of existing and readily available data.

It is additionally concerning that due to the State's new staged approach to 303(d) List review, further data solicitation will be delayed until the Central Coast Regional Board's 2020 report. This means that the Regional Board will not have reviewed existing water quality data for our region for a complete decade. This is clearly unacceptable from a legal standpoint.

Given the Regional Board's failure to conduct timely data solicitation processes, any view that data need be submitted via the State's CEDEN database system for purposes of the 2014 Integrated Report is unfairly burdensome and inappropriate. Monitoring entities, such as Channelkeeper, depend on timely notifications by agencies to manage our programmatic resources and undertakings. Integration with the CEDEN system is a significant undertaking that Channelkeeper is now pursuing in coordination with Regional data center staff. However, this process will take additional time to complete.

Channelkeeper, therefore, submits pertinent and readily available water quality data as a component of these comments**.** *It is our view that the Regional Board must consider this data in its analysis for the 2014 Integrated Report. Should the Regional Board choose not to incorporate existing data for this report, Channelkeeper requests that the Board commit to performance of a formal data solicitation in 2017 and subsequent redevelopment of an Integrated Report in 2018.*

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[1] Environmental Protection Agency. "Information Concerning 2016 Clean Water Act Sections 303(d), 305(b), and 314 Integrated Reporting and Listing Decisions." August 13, 2015.
[2] 40 C.F.R. § 130.7(b)(5)

### B. Missing Data

Channelkeeper submitted data to the State Water Resources Control Board during the 2010 Data Solicitation process, which appears to have not been considered during development of this Draft Integrated Report. Specifically, Channelkeeper submitted trash monitoring data collected in accordance with State Board Rapid Trash Assessment protocols (Appendix A). This monitoring indicated water quality segments impaired by trash, which are not reflected in the Draft 2014 Integrated Report. *We ask that the Regional Board revise the Draft Integrated Report to reflect analysis of our complete 2010 data submittal.*

### C. Category 4C and Hydrologically Impaired Waterways

Channelkeeper echoes and supports comments submitted to the Regional Board on September 21, 2016 by *Earth Law Center* regarding the necessity for evaluation and listing for hydrologically impaired waterways to fully comply with Clean Water Act Sections 305(b) and 303(d). Such evaluation and listing is clearly called for under the Clean Water Act, is supported by EPA Guidance, and paves the way for sound public policy and planning. Many other states around the country follow such Guidance to properly identify flow impaired waterways in their Integrated Reports. The San Diego Regional Water Quality Control Board notably proposes 30 waterway segments for listing in Category 4C for flow impairments. Channelkeeper notes with concern that the Central Coast Region has apparently forgone assessment of Category 4C impairments altogether in the Draft 2014 Integrated Report. We question the legality of such an oversight.

## 2. Proposed De-Listing Concerns

### A. Determinations Not Supported By Analysis of Available Data

Channelkeeper questions the legality of removing impairments from the 303(d) List based on outdated data. Such determinations need be based on all existing and readily available data. *We therefore oppose delisting proposals (apart from those made to correct administrative errors) until an appropriate data analysis has been completed.*

### B. Fecal Coliform De-listing Determinations Not Based on Appropriate Line of Evidence

Channelkeeper has additional and ongoing concerns with proposals to de-list Central Coast beaches for fecal bacteria. Despite previous Channelkeeper comments in the administrative record (May 2009) addressing this issue, the Regional Board continues to inappropriately use E. coli data as a sole metric to inform de-listing determinations for fecal coliform impairments. According to the Regional Board's fact sheets, the decision to de-list beaches for fecal coliform was made by comparing AB 411 data to the Ocean Plan fecal coliform criteria for Water Contact Recreation. AB 411 data is collected by the Santa Barbara County Public Health Department Beach Monitoring Program. This program uses the IDEXX Colilert-18 method to analyze water samples for E. coli. E. coli results are then reported as fecal coliform. E. coli, however, is a subset of fecal coliform. The fecal coliform family includes additional species other than E. coli. The true fecal coliform concentration is inherently at least as high as the E. coli result, but there may be other fecal coliform

present. The IDEXX Colilert-18 method does not identify additional fecal coliform species. Therefore, although it may be appropriate to list a water body for fecal coliform when E. coli results exceed applicable fecal coliform standards, it is not an appropriate comparison for a de-listing decision. To quote our 2009 comment letter:

> "If we may propose an analogy using M&Ms: Let us assume that the State passes a law that a person can only consume ten M&Ms per day but they devise a monitoring program that only counts the green ones. If monitoring determines that an individual has consumed eleven green M&Ms, then we can be assured that the person is over their limit. However, if monitoring determines that an individual has consumed only five green M&Ms, we cannot conclude that they are not over their limit. There are many other colors in the bag."

The Regional Board must either apply a marine E. coli evaluation criteria for comparison purposes or utilize fecal coliform data from an approved fecal coliform test such as Membrane Filtration or Multiple Tube Fermentation methods.

We suggest that an additional alternative could be for the Regional Board to adopt and apply a "margin of safety" to the fecal coliform Water Quality Objective for purposes of comparison to E. coli data. *As it stands, however, Channelkeeper currently opposes all proposals to de-list Central Coast beaches for fecal coliform impairments.*

## 3. Seperate Determinations for Lagoons and Upstream Reach Segments

Channelkeeper's Stream Team data demonstrates that water quality conditions are often vastly different in a lagoon compared the main stem reach. Here, we highlight Bell Creek and Tecolote Creek where this is apparent. pH and dissolved oxygen data collected by Channelkeeper's Stream Team from October 2008 through July 2016 is summarized in Table 1. As shown, the lagoon sites exhibit impaired conditions at a greater frequency than their upstream counterparts. When sites are combined for evaluation purposes, the less impaired site often precludes the waterbody from listing. However, such listings may be appropriate if lagoons are evaluated independently. *We recommend that the Regional Board evaluate whether lagoon sites should receive separate listings when both main stem and lagoon data are available.*

To this end, Channelkeeper has separated Bell Creek and Tecolote Creek Lagoon sites from main stem sites for the analyses below. As shown, our data indicates that Bell Creek Lagoon should be added to the 303(d) List as pH impaired. Tecolote Creek Lagoon should be added to the 303(d) List as dissolved oxygen impaired. We also note, that Bell Creek Lagoon qualifies for addition to the 303(d) List if an evaluation criteria for super-saturated dissolved oxygen concentrations is considered (i.e. > 13 mg/L).

## 4. Additional Recommended Listings Based on Historic and Current Datasets

Failure to solicit current data is resulting in an incomplete 303(d) list. Below, are highlighted additional impairments based on an analysis of Channelkeeper Stream Team data from June, 2002 through July, 2016. We performed a listing analysis on two dataset

timelines: Stream Team data already submitted through the 2010 data solicitation and the complete Stream Team dataset through July, 2016.

**Table 1: Lagoon to Main Stem Comparison**

| Site | Parameter Exceeded | | | | | |
|---|---|---|---|---|---|---|
| | pH | | DO <5 mg/L | | DO <5 and >13 mg/L | |
| | Exceedances | Total Samples | Exceedances | Total Samples | Exceedances | Total Samples |
| Bell Creek Lagoon (BL1) | 14 | 88 | 3 | 86 | 33 | 86 |
| Bell Creek (BL2) | 0 | 65 | 0 | 65 | 7 | 65 |
| Tecolote Creek Lagoon (TC1) | 2 | 84 | 15 | 85 | 34 | 85 |
| Tecolote Creek (TC2) | 2 | 54 | 4 | 54 | 5 | 54 |

### A. pH

An analysis of Channelkeeper's pH data (Table 2) reveals that current data supports the listing of Devereux Creek, Arroyo Paredon Creek, and Carpinteria Creek Lagoon for pH. We note with concern that our analysis also reveals that pH impairment listings are justified for Devereux Creek based on data previously submitted to the Regional Board in 2010. The Draft 2014 Integrated Report fails to recognize this impairment. *Channelkeeper recommends that Devereux Creek, Arroyo Paredon Creek, and Carpinteria Creek Lagoon be added to the 2014 303(d) List.*

**Table 2: Justified pH Listings Using Listing Policy Binomial Test**

| Dataset | Creeks to be listed | Total # Samples | # Samples Exceeding | # Exceedance Required | Meets Binomial Test? |
|---|---|---|---|---|---|
| | Devereux Creek | | | | |
| | DV21 | 31 | 3 | 6 | |
| | DV22 | 37 | 19 | 7 | |
| | DV24 | 37 | 2 | 7 | |
| | DV25 | 37 | 0 | 7 | |
| | Total | 142 | 24 | 24 | Yes |
| | Arroyo Paredon Creek | 68 | 31 | 12 | Yes |
| | Carp. Creek Lagoon | 67 | 14 | 12 | Yes |
| **All Data** **June 2007* - July 2016** | Devereux Creek | | | | |
| | DV21 | 69 | 5 | 12 | |
| | DV22 | 95 | 55 | 16 | |
| | DV24 | 107 | 2 | 18 | |
| | DV25 | 80 | 0 | 14 | |
| | Total | 351 | 62 | 59 | Yes |

### B. Dissolved Oxygen

Channelkeeper also analyzed Stream Team data for dissolved oxygen impairments using the binomial test (Table 3). This data again indicates a pressing need for the Regional Board to evaluate readily available data. Tecolote Creek is designated critical habitat for Southern Steelhead and our analysis demonstrates that the lagoon is impaired by low dissolved oxygen concentrations.[3] *We recommend its inclusion in the 303(d) List.*

**Table 3: Justified Dissolved Oxygen Listings Using Binomial Test (<5 mg/L)**

| Dataset | Creeks to be listed | Total Samples | Samples Exceeding | # Exceedances Required | Meets Binomial Test? |
|---|---|---|---|---|---|
| **Historic Record Data:** October 2008 - August 2010 (previously submitted to the State Water Resources Control Board) | Tecolote Lagoon | 21 | 2 | 5 | No |
| **All Data** October 2008 - July 2016 | Tecolote Lagoon | 85 | 15 | 15 | Yes |

Table 4 demonstrates that the Board neglected to *designate the Goleta Slough as impaired for dissolved oxygen* (per the cold water Quality Objective) based on historical data previously submitted by Channelkeeper. An analysis of more current data further supports this determination. Additionally, we note *that Tecolote Creek should also be designated as impaired for low dissolved oxygen based on current datasets.*

**Table 4: Justified Dissolved Oxygen Listings Using Binomial Test (<7 mg/L)**

| Dataset | Creeks to be listed | Total # Samples | Samples Exceeding | # Exceedance Required | Meets Binomial Test? |
|---|---|---|---|---|---|
| **Historic Record Data:** October 2004 - August 2010 (previously submitted to the State Water Resources Control Board) | Goleta Slough | 69 | 20 | 12 | Yes |
| **All Data** October 2008 - July 2016 | Goleta Slough | 145 | 45 | 24 | Yes |
| | Tecolote Creek | | | | |
| | TC1 | 85 | 21 | 15 | Yes |
| | TC2 | 54 | 8 | 9 | No |
| | Total | 139 | 29 | 23 | Yes |

[3] 50 C.F.R. § 226.211

Dissolved oxygen conditions are challenging to assess because minimum concentrations normally occur in pre-dawn hours. Channelkeeper's Stream Team data is often collected between the hours of 9am and 1pm, not when we would expect minimum values. While values under the 5 mg/L and 7 mg/L objectives during this time are valid, it is important to recognize that lack of exceedances in Channelkeeper Stream Team data for dissolved oxygen WQOs does not necessarily indicate that the waterway is not impaired. Further, Stream Team data frequently demonstrates super-saturated conditions, which may also be indicative of bio-stimulatory impairment.

**Table 5: Justified Bio-stimulatory Listings Using Binomial Test (Dissolved Oxygen <5 and >13 mg/L)**

| Dataset | Creeks to be listed | Total Samples | Samples Exceeding | # Exceedances Required | Meets Binomial Test? |
|---|---|---|---|---|---|
| **Historic Record Data:** October 2004 - August 2010 (previously submitted to the State Water Resources Control Board) | Goleta Slough | 18 | 69 | 12 | Yes |
| | Tecolote Lagoon | 21 | 6 | 5 | Yes |
| **All Data** January 2003 - July 2016 | Arroyo Paredon | 62 | 31 | 11 | Yes |
| | Bell Creek Lagoon | 86 | 33 | 15 | Yes |
| | Carp. Lagoon | 61 | 12 | 11 | Yes |
| | Franklin Creek | 64 | 46 | 11 | Yes |
| | Goleta Slough | 145 | 29 | 24 | Yes |
| | Las Vegas Creek | 51 | 10 | 9 | Yes |
| | Santa Monica Crk. | 29 | 5 | 5 | Yes |
| | San Pedro Creek | | | | |
| | SP1 | 106 | 24 | 18 | Yes |
| | SP3 | 85 | 0 | 15 | No |
| | Total | 191 | 24 | 32 | Yes |
| | Tecolote Lagoon | 85 | 34 | 15 | Yes |

In the 2014 Integrated Report, Board staff used 13 mg/L as an initial indication of bio-stimulatory impairment.[4] *Channelkeeper supports the incorporation of this quantitative benchmark to assess bio-stimulatory related impairments.* Table 5 provides an analysis of Stream Team data using <5 mg/L and >13 mg/L as evaluation criteria.

Application of these criteria to Channelkeeper's previously submitted dataset indicates that the *Goleta Slough and Tecolote Lagoon should be designated as having bio-stimulatory impairment.* We recommend that the Draft 2014 Integrated Report be updated to reflect

[4] Worcester, K.R., D. M. Paradies, M.Adams. 2010. Interpreting Narrative Objectives for Biostimulatory Substances for California Central Coast Waters. Surface Water Ambient Monitoring Program Technical Report. July 2010.

these additions. We also note that an evaluation of our current dataset supports bio-stimulatory listings for additional water bodies including: Arroyo Paredon Creek, Bell Creek Lagoon, Carpinteria Creek Lagoon, Franklin Creek, the Goleta Slough, Las Vegas Creek, Santa Monica Creek, and San Pedro Creek. *Channelkeeper recommends that the Regional Board analyze these water bodies for "bio-stimulatory" impairment as part of the 2014 Integrated Report.*

**Conclusion**

Thank you for the opportunity to comment on the Central Coast Water Board's Draft 2014 Integrated Report. Channelkeeper appreciates the Board's attention to the issues that we raise and hope action will be taken to address our concerns.

Respectfully,

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Ben Pitterle
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*Attached via electronic submittal:*

- SBCKdata_pH_DO_E.Coli thru July 2016.xlxs
- QAPP Addendum_vta-gol.pdf
- QAPP FINAL_vta-gol.pdf
- QAPP_carp.pdf

**APPENDIX A**
**SBCK Rapid Trash Assessment Data**
*Submitted in 2010 Data Submittal Folder*

| | | | Trash Item Scores (0-20, higher is better) | | | | | | Trash Item Tally (# of items) | | | | | | | | | | (0-120) | % | A-F |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Waterbody / Stream | Station # | Date | Level of Trash | Actual # of Trash Items Found | Threat to Aquatic Life | Threat to Human Health | Illegal Dumping and Littering | Accumulation of Trash | Plastic | Metal | Glass | Biodegradable | Fabric and Cloth | Toxic | Biohazard | Construction Debris | Large | Miscellaneous | Total Score | Total Score | Grade |
| **Atascadero** | AT2 | 4/24/10 | 3 | 1 | 7 | 16 | 17 | 0 | 184 | 10 | 7 | 1 | 2 | 14 | 0 | 2 | 0 | 52 | **44** | **37%** | **D+** |
| | AT3 | 4/24/10 | 20 | 19 | 19 | 20 | 19 | 20 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | **117** | **98%** | |
| **Bell** | BL01 | 4/24/10 | 6 | 4 | 10 | 14 | 12 | 11 | 26 | 8 | 5 | 0 | 1 | 4 | 0 | 1 | 0 | 5 | **57** | **48%** | **F** |
| | BL02 | 4/24/10 | 11 | 9 | 15 | 15 | 15 | 17 | 16 | 2 | 2 | 3 | 1 | 0 | 0 | 4 | 0 | 2 | **82** | **68%** | |
| **Glen Annie** | GA1 | 4/24/10 | 14 | 12 | 10 | 10 | 18 | 18 | 16 | 9 | 2 | 3 | 0 | 1 | 3 | 0 | 0 | 0 | **82** | **68%** | **D** |
| | GA2 | 4/24/10 | 10 | 7 | 16 | 19 | 4 | 14 | 8 | 1 | 0 | 0 | 7 | 1 | 0 | 3 | 0 | 8 | **70** | **58%** | |
| **Goleta Slough** | GS1 | 4/24/10 | 13 | 8 | 8 | 18 | 18 | 18 | 39 | 0 | 5 | 0 | 0 | 31 | 0 | 9 | 0 | 4 | **83** | **69%** | **D+** |
| **Los Carneros** | LC2 | 4/24/10 | 13 | 12 | 18 | 18 | 19 | 18 | 5 | 1 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | **98** | **82%** | **B-** |
| **Maria Ygnacio** | MY1.5 | 4/24/10 | 13 | 7 | 8 | 14 | 13 | 17 | 22 | 9 | 2 | 6 | 5 | 1 | 0 | 0 | 0 | 6 | **72** | **60%** | **D-** |
| | MY2 | 4/24/10 | 15 | 13 | 14 | 19 | 18 | 10 | 3 | 0 | 1 | 4 | 1 | 0 | 0 | 6 | 0 | 1 | **89** | **74%** | **C+** |

| | | | | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Phelps** | DV21 | 4/24/10 | 9 | 3 | 7 | 10 | 9 | 14 | 61 | 8 | 0 | 5 | 0 | 0 | 2 | 0 | 0 | 4 | **52** | **43%** | **F** |
| | DV22 | 4/24/10 | 8 | 0 | 10 | 13 | 10 | 7 | 64 | 7 | 2 | 7 | 1 | 3 | 2 | 1 | 0 | 4 | **48** | **40%** | |
| **San Jose** | SJ1 | 4/24/10 | 16 | 14 | 10 | 19 | 17 | 17 | 36 | 2 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | **93** | **78%** | **C+** |
| | SJ1.5 | 4/24/10 | 12 | 18 | 16 | 18 | 20 | 16 | 4 | 2 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | **100** | **83%** | **B** |
| | SJ2 | 4/24/10 | 20 | 15 | 19 | 19 | 20 | 20 | 1 | 1 | 1 | 2 | 0 | 0 | 0 | 0 | 0 | 1 | **113** | **94%** | **A** |
| **San Pedro** | SP1 | 4/24/10 | 18 | 6 | 14 | 20 | 19 | 19 | 8 | 9 | 17 | 1 | 0 | 0 | 0 | 15 | 0 | 0 | **96** | **80%** | **B-** |
| | SP1.5 | 4/24/10 | 18 | 14 | 12 | 18 | 9 | 16 | 28 | 6 | 2 | 2 | 5 | 0 | 0 | 0 | 1 | 4 | **87** | **73%** | **C** |
| **Sycamore Creek** | at Clifton | 3/17/10 | 10 | 6 | 11 | 10 | 13 | 10 | 27 | 9 | 2 | 6 | 3 | 1 | 0 | 0 | 1 | 0 | **60** | **50%** | **F** |
| | Cacique | 5/15/10 | 10 | 7 | 9 | 10 | 13 | 13 | 27 | 1 | 3 | 6 | 0 | 5 | 1 | 6 | 0 | 0 | **62** | **52%** | **F** |
| | Punta Gorda | 5/15/10 | 10 | 5 | 10 | 15 | 13 | 13 | 19 | 1 | 1 | 8 | 0 | 23 | 0 | 0 | 0 | 0 | **66** | **55%** | **F** |
| **Tecolote** | TC01 | 4/24/10 | 5 | 0 | 3 | 6 | 6 | 5 | 130 | 13 | 1 | 8 | 3 | 14 | 4 | 2 | 0 | 24 | **25** | **21%** | **F** |
| **West Beach (Santa Barbara)** | S1 | 4/11/10 | 10 | 10 | 11 | 18 | 16 | 9 | 29 | 9 | 0 | 0 | 0 | 48 | 0 | 1 | 1 | 2 | **74** | **62%** | **D-** |
| | S2 | 4/11/10 | 10 | 14 | 10 | 12 | 16 | 15 | 54 | 30 | 2 | 10 | 0 | 29 | 0 | 0 | 1 | 10 | **77** | **64%** | **D** |
| | S3 | 4/11/10 | 10 | 12 | 9 | 14 | 18 | 15 | 55 | 14 | 0 | 3 | 2 | 15 | 8 | 3 | 1 | 3 | **78** | **65%** | **D** |
| | S4 | 4/11/10 | 16 | 8 | 16 | 17 | 19 | 16 | 26 | 14 | 6 | 6 | 7 | 23 | 0 | 4 | 6 | 12 | **92** | **77%** | **C+** |
| | S5 | 4/11/10 | 13 | 10 | 17 | 18 | 20 | 17 | 13 | 2 | 0 | 0 | 2 | 11 | 2 | 3 | 0 | 0 | **95** | **79%** | **C+** |
| **Mission Creek** | Oak Park | 5/23/10 | 13 | 14 | 10 | 15 | 15 | 15 | 9 | 2 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | **82** | **68%** | **D** |